

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**AVI AVRAHAM ZINGER, and
AMERICAN QUALITY PRODUCTS
LTD.,**

Plaintiffs,

v.

**BEN & JERRY'S HOMEMADE, INC.,
UNILEVER UNITED STATES, INC. and
CONOPCO, INC.,**

Defendants.

Civil Case No.: 2:22cv01154(KM)(JBC)

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

This matter having been opened to the Court by Greenberg Dauber Epstein & Tucker, P.C., counsel for Plaintiffs Avi Avraham Zinger and American Quality Products Ltd (“AQP”) (collectively “Plaintiffs”), by way of Motion Seeking a Preliminary Injunction, and the Court having reviewed the submissions of the parties, and good cause appearing:

IT IS ON THIS ____ DAY OF _____, 2022,

ORDERED that Plaintiffs’ Motion Seeking a Preliminary Injunction is GRANTED.

Defendants Ben & Jerry’s Homemade, Inc., Unilever United States, Inc. and Conopco, Inc., their officers, agents, assigns, parents, subsidiaries, affiliates and all other persons acting or claiming to act in concert or participation with or on their behalf are hereby restrained and enjoined from the following during the pendency of this action and until further order of the Court:

1. Terminating or non-renewing the License Agreement between the Parties or otherwise changing the status quo of the License Agreement and business relationship agreement between the Parties;
2. Issuing any public statements on behalf of B&J regarding termination or non-renewal of the License Agreement; and
3. The License Agreement business relationship between the parties shall remain in place and without interruption until further Order of the Court.

IT IS SO ORDERED

DATED: _____, 2022

Hon. Kevin McNulty, USDJ